

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
NORTHERN DIVISION

WILLIAM JOHNSON, JILL JOHNSON,  
BRIAN MASON, NAOMI MASON, AND  
SECOND AMENDMENT FOUNDATION,  
INC.

Plaintiffs,

v.

NICK LYON, in his official capacity as  
Director of the Michigan Department of Health  
and Human Services,  
Defendant.

No. 2:17-CV-124

HON. PAUL L. MALONEY

MAG. TIMOTHY P. GREELEY

---

David G. Sigale  
Attorney for Plaintiffs  
Law Firm of David G. Sigale, P.C.  
799 Roosevelt Rd., Ste. 207  
Glen Ellyn, IL 60137  
630-452-4547  
dsigale@sigalelaw.com

---

Joshua S. Smith  
Attorney for Defendant Nick Lyon  
Michigan Department of Attorney  
General, HEFS Division  
P.O. Box 30758  
Lansing, MI 48909  
517-335-1238  
Smithj46@michigan.gov

---

**NOTICE OF SCREENING DEVICE**

To: The Court, All Parties, and their Attorneys:

**PLEASE TAKE NOTICE THAT**, pursuant to the Michigan Rule of  
Professional Conduct:

1. A potential or actual conflict of interest, or the appearance of a conflict of interest, exists in the above matter between (1) the Attorney General's Executive Team, the Solicitor General, and select Department staff, and (2) the Health, Education, and Family Services Division and select staff from the Solicitor General Division.

2. A screening notice has been sent to all Michigan Attorney General staff advising that a conflict wall has been established and identifying all divisions screened from this matter. The screening notice specifies the conduct appropriate to observe the conflict wall.

3. The relevant divisions within the Department are instructed to physically label all paper files relating to the screened matter and to place the file in a physically segregated area marked with special coding. The label identifies all other divisions who are screened from the file to clearly establish who may not view the contents of the file. Any computer or electronic files are likewise marked and access denied to any screened employees.

4. The procedures outlined above have been completed in this matter.

Respectfully submitted,

Bill Schuette  
Attorney General

/s/ Aaron D. Lindstrom  
Solicitor General  
P.O. Box 30212  
Lansing, MI 48909  
517-241-8403  
LindstromA@michigan.gov  
[P72916]

Date: November 15, 2017